

Please accept the following comments on FCC Proceeding # 02-278:

As a small association with one full-time staff member, the ability to fax information of all sorts to our member organizations and to other organizations with which we have relationships has been critical to our success. We have also learned over time that advances in fax capabilities has significantly increased the productivity of many organizations.

It is therefore with dismay that we learned of FCC regulations implementing the "no call" list related to organizations' ability to fax to those with which it has established a business relationship. The current regulations on unsolicited faxes work very well. We receive very few and are able to get off of those lists quickly and easily. And we want to receive information, reminders, etc. from organizations with whom we have a relationship with.

Of course, individuals and fax numbers do change. Under the rules to take effect Aug. 25, we could be subject to fine and lawsuit for sending a fax to a number that we had yet to be updated on by the organization. While we are certain that we would never be a subject of complaint or lawsuit, it seems an extraordinary burden to continue being completely legal.

The new regulation seems to be addressing a problem that does not exist. By removing the "established business relationship" test, the FCC is greatly adding to the burden of all organizations with no real benefit to potential recipients of faxes. We would urge the FCC to restore this test as a legitimate way to balance the right to avoid unwanted fax solicitations and the productivity of our economy.

Thank you for your consideration.

Bob Jacobi
Executive Director
Labor-Management Council of Greater Kansas City